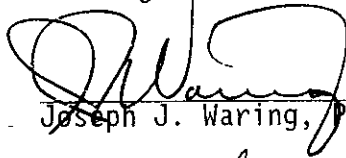


Meeting Minutes Transmittal

CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Stevens Center, Room 1200
Richland, Washington

October 15, 1997
 1:00 p.m. to 4:00 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated Project Managers Meeting.



Joseph J. Waring, Program Manager, DOE-RL

Date: 11/17/97



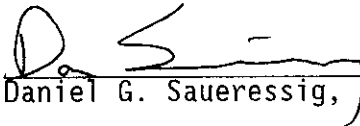
Ted A. Wooley, Unit Manager, for Laura Cusack, Project Manager,
 Washington State Department of Ecology

Date: 11/17/97

Not Present

Date:

Anthony G. Miskho, Contractor Representative, FDH



Daniel G. Saueressig, Permitting Representative, WMH

Date: 11/17/97

Central Waste Complex, WMH Concurrence



Kent M. McDonald, Contractor Representative, WMH
 (Represented by Larry R. Olsen, WMH)

Date: 11/17/97

Purpose: Discuss permitting process.

Meeting Minutes are attached. The minutes are comprised of the following:

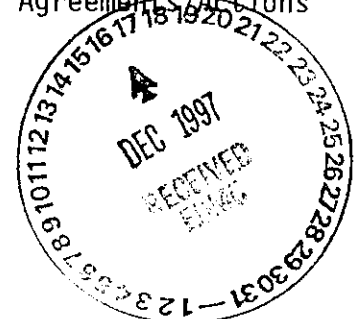
Attachment 1 - Agenda

Attachment 2 - Summary of Discussion and Commitments/Agreements

Attachment 3 - Attendance List

Attachment 4 - Action Items

Attachment 5 - Notice of Deficiency Response Table with Agreements/Actions
 Resulting from Part B Workshop



Attachment 1

**CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Stevens Center, Room 1200
Richland, Washington**

**October 15, 1997
1:00 p.m. to 4:00 p.m.**

AGENDA

- 1. PREVIOUS MEETING MINUTES**
- 2. PERMIT APPLICATION STATUS**
 - Part B NOD Workshop Schedule (D. Saueressig - WMH)
- 3. BUDGET TOPICS**
 - FY98 Budget Status (D. Saueressig - WMH)
- 4. CONTAINERS RECEIVED FROM ARGONNE NATIONAL LABORATORY**
- 5. CONVERSION OF BUILDING 2401-W FROM PART OF TSD UNIT TO 90-DAY ACCUMULATION AREA**
- 6. GENERAL TOPICS**
 - Past Action Items
 - 3-21-96:3 Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor.
ACTION: Mr. Miskho

OPEN
 - 5-31-96:2 WMH will provide Ecology (T. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM.
ACTION: Mr. Miskho

OPEN
 - 11-12-96:1 Mr. Wooley, (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (WMH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan.
ACTION: Mr. Wooley

OPEN
 - 11-12-96:2 Mr. Miskho (FDH) will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval.
ACTION: Mr. Miskho

OPEN

12-11-96:1 Mr. Barnes (WMH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC.
ACTION: Mr. Barnes

OPEN

- New Action Items

7. SCHEDULE NEXT MEETING

- Tentative Date

8. PART B WORKSHOP

Attachment 2

CENTRAL WASTE COMPLEX Project Managers Meeting/Part B Workshop 2440 Stevens Center, Room 1200 Richland, Washington

**October 15, 1997
1:00 p.m. to 4:00 p.m.**

Summary of Discussion and Commitments/Agreements

1. PREVIOUS MEETING MINUTES

The September 15, 1997 Project Manager Meeting (PMM) minutes were approved. The 8/9/97 meeting minutes will be approved following a discussion between Mr. T. Wooley (Ecology) and Mr. K. McDonald (WMH) regarding the verification on the percentages of nonhazardous sludge, and the gram quantities that were listed.

2. PERMIT APPLICATION STATUS

- **Part B NOD Workshop Schedule**

Mr. D. Saueressig (WMH) reported that due to the continued revision of the Waste Analysis Plan (WAP) and issues associated with conversion of the 2401-W Building, the parties are slightly behind schedule. Mr. Saueressig suggested the possibility of scheduling bi-monthly meetings in an effort to resolve these issues and maintain the schedule. The current plan is to provide Ecology a draft WAP for review and comment by the end of October 1997.

Mr. Wooley stated that the NOD comments generated from his '96 - '97 review of the Building Emergency Plan (BEP) will be resubmitted for resolution during the workshops. Mr. J. Waring (DOE-RL) inquired about any impact to the workshop schedule resulting from resolution of the NODs. Mr. Wooley stated that he would agree to scheduling extra meetings in an effort to maintain the schedule.

3. BUDGET TOPICS

- **FY98 Budget Status**

Mr. Saueressig stated that funding is available for FY98 to finalize the CWC Part B Permit Application for certification and submit it to Ecology by June 1, 1998. Mr. Waring concurred that the Basis of Estimates (BOEs) reflect sufficient funding for FY98. Mr. Wooley reiterated his observation regarding the detail of the BOEs as compared to the Multi-year Work Plan (MYWP), and the difficulty in correlating the two documents. Mr. Waring acknowledged the disconnect between the two documents, and stated that the MYWP will be structured differently starting in FY99.

4. CONTAINERS RECEIVED FROM ARGONNE NATIONAL LABORATORY

Mr. Saueressig reported that all of the containers have been sent to T Plant and vented and overpacked. Mr. Waring stated that DOE-HQ has established a policy that Argonne is responsible for payment of corrective actions associated with the disposition of the containers of up to \$220,000. Mr. Waring noted that the actual cost may exceed the \$220,000 by approximately \$5,000. Mr. Wooley requested a breakdown of the costs.

5. CONVERSION OF BUILDING 2401-W FROM PART OF TSD UNIT TO 90 DAY ACCUMULATION AREA

Mr. Saueressig reported that a meeting was held the first week of October 1997, and the following plan was decided upon by WMH, FDH, and DOE-RL: maintain the 2401-W Building as part of the CWC treatment, storage and disposal (TSD) unit and manage 2401-W in the same manner as it is being managed at the 90-day accumulation area; negotiate with Ecology regarding the 2401-W information to be included in the final status Waste Analysis Plan (WAP); and provide Ecology a letter by October 21, 1997, outlining the plan. Mr. Saueressig added that the understanding is that Ecology will provide a response by October 21, 1997, with its decision on whether conversion to a 90-day accumulation area and removing 2401-W from the TSD unit boundary is an option.

Mr. Wooley stated that Ecology is waiting to receive supporting information, including the WAP, before making a decision, and that Ecology is still considering all the options. Mr. Wooley noted Ecology's concern regarding the use of a single 90-day pad by all of the generators on site and the possibility of mismanagement of waste. Ecology is having an internal meeting today to discuss the issue.

6. GENERAL TOPICS

- **Past Action Items**

3-21-96:2, Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor.

This action item was left open.

5-31-96:2, WMH will provide Ecology (T. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM.

This action item was left open.

11-12-96:1, Mr. Wooley, (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (WMH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan.

This action item is open.

11-12-96:2, Mr. Miskho (FDH) will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval.

This action item was left open.

12-11-96:1, Mr. Barnes (WMH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC.

This action item was left open.

- New Action Items

There were no new action items.

7. SCHEDULE NEXT MEETING

- Tentative Date

The next PMM was scheduled for November 12, 1997, from 1:00 to 4:00 p.m. in Richland, Washington.

- Proposed Topics

Proposed topics may be submitted to Mr. Saueressig.

Attachment 3

CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Sevens Center, Room 1200
Richland, Washington

October 15, 1997
1:00 p.m. to 4:00 p.m.

Attendance List

Name	Organization	Phone #
Ted Wooley	Ecology	736-3012
Paul Macbeth	GSSC	372-2289
Randy Ames	WMH	373-2067
Kathy Knox	Knox Court Reporting	946-5535
Dan Saueressig	WMH	376-9739
Larry Olsen	WMH	376-8737
Joe Waring	DOE-RL	373-7687
Tony McKarns	DOE-RL	376-8981

Attachment 4
CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Stevens Center, Room 1200
Richland, Washington

October 15, 1997
1:00 p.m. to 4:00 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
3-21-96:3	Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor. ACTION: Mr. Miskho (FDH) OPEN
5-31-96:2	WMH will provide Ecology (T. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM. ACTION: Mr. Miskho (FDH) OPEN
11-12-96:1	Mr. Wooley (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (WMH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan. ACTION: Mr. Wooley (Ecology) OPEN
11-12-96:2	Mr. Miskho (FDH) will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval. ACTION: Mr. Miskho (FDH) OPEN
12-11-96:1	Mr. Barnes (WMH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC. ACTION: Mr. Barnes (WMH) OPEN

08-13-97:1 WMH will provide Ecology justification for disposition of the bulging Argonne containers by venting/overpacking
ACTION: Mr. McDonald (WMH)

CLOSED

08-13-97:2 WMH will provide Ecology the off-site generator assessment that was performed on the Argonne containers and Argonne's container summary sheets
ACTION: Mr. Emerson/Mr. G. Triner (WMH)

CLOSED

08-13-97:3 WMH will provide Ecology an estimate of the number of off-site containers that are stored at CWC, with a breakdown of the waste (organic) and potential problems with long-term storage.
ACTION: Mr. McDonald (WMH)

CLOSED

Attachment 5

CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Stevens Center, Room 1200
Richland, Washington

October 15, 1997
1:00 p.m. to 4:00 p.m.

NOTICE OF DEFICIENCY RESPONSE TABLE
WITH AGREEMENTS/ACTIONS RESULTING
FROM PART B WORKSHOP

Hanford Facility Dangerous Waste Permit Application,
Central Waste Complex DOE/RL-91-17 WD2
Notice of Deficiency Table No. 1

No.	Comment/Requirement
1. <u>Page 1-1, line 17.</u> <u>Comment:</u> It is not clear why the Part A, form 3s for the Central Waste Complex (CWC) and Waste Receiving and Processing (WRAP) were combined.	<u>Requirement:</u> Clarify this part of the discussion.
<u>DOE-RL/FDH Response:</u> They are not combined, and were split into two separate Form 3's on January 25, 1995 (Revision 3). Originally the Hanford Central Waste Complex (Hanford CWC) Part B included the Radioactive Mixed Waste Storage Facility (now known as CWC), and the Waste Receiving and Processing Modules 1, 2A, and 2B. The TPA identified two Part B's for this one unit, and two distinct milestones for submittal of the Radioactive Mixed Waste Storage Facility Part B (Milestone M-20-05) and the Waste Receiving and Processing Module 1 [Module 2A and 2B to be included as revisions to the WRAP Part B (Milestone M-20-12)]. A decision was made to separate the Part A into two separate Part A's to match the Part B's.	
CLOSED (6/4/97)	
2. <u>Page 1-1, line 20.</u> <u>Comment:</u> Ecology's review of the most recent CWC Part A, form 3, REV 3 against REV 4 did not identify an additional 23 waste codes. Please identify which codes were added. If REV 4, dated 10/01/96, is not the most current CWC Part A, the U.S. Department of Energy (USDOE) will need to resubmit the currently active Part A and, if there are significant changes, re-certification may have to take place.	<u>Requirement:</u> Explain how the addition of 23 waste codes was justified and to which Part A revision.

DOE-RL/FDH Response: The 23 additional dangerous waste numbers were added to Revision 3 of the Part A, Form 3. Comparison of Revision 2 against Revision 3 will identify waste numbers that were added. No comments were received from Ecology on Revision 3, therefore Revision 3 was approved. As the Washington Administrative Code (WAC) 173-303 is revised, dangerous waste numbers are added and/or deleted from the regulations. Therefore, when the Part A was revised, these dangerous waste numbers were either added or deleted to reflect the current revision of WAC 173-303. Revision 4 (included in this draft permit application) is the most current version and was submitted when the Project Hanford Management Contract was awarded to Fluor Daniel Hanford, Inc.

CLOSED (7/9/97)

3. Page 2-1, Section 2.0. Comment: Ecology's Dangerous Waste Permit Application Requirements document, sections B-1a(2) and (3) have not been addressed. Items, such as a detailed flow diagram description of the dangerous waste management operations and any Dangerous Waste Regulations regarding "treatment by generator," are missing from this section.

Requirement: Review the permit application requirements, as referenced above, and revise the Part B accordingly.

DOE-RL/FDH Response: ~~Per the Ecology Part B checklist [B-1a(2)], this information is referenced and discussed in Chapters 3.0 and 4.0 and Appendix 3A per the Ecology Part B checklist [B-1a(2)] guidance that duplicate information is not required. This draft permit application was developed before the Waste Analysis Plan (WAP) guidance was finalized.~~ The WAP will be revised before the next submittal to incorporate the guidance. Treatment by generator activities are outside the scope of this permit application.

OPEN PENDING REVIEW OF WASTE ANALYSIS PLAN AND DISCUSSION ON POINT OF GENERATION (E.G., SPILL CLEANUP [POG: y], REPACKAGING [POG: ?], AND MOVEMENT OF CONTAINERS [POG: N]) (6/4/97). MORE DETAIL ON TREATMENT WILL BE INCLUDED IN THE WASTE ANALYSIS PLAN AND CHAPTER 4.0. A DETAILED FLOW DIAGRAM OF THE WASTE ACCEPTANCE PROCESS WILL BE INCLUDED IN THE WASTE ANALYSIS PLAN (7/9/97).

4. Page 2-1, line 51. Comment: The sentence beginning with, "The floor accommodates a 908-Kg forklift ... and an approximate 1000, container equivalent load, depending on the waste management criteria," is confusing. What is a 1000 container equivalent load? Also, what does discussion on floor load capacity have to do with waste management criteria?

Requirement: Please revise\clarify this sentence with the above questions being the basis for revision.

DOE-RL/FDH Response: A 1,000 container equivalent load is equivalent to 1,000 208-liter containers full

of water. For example, using the weight of water, which is approximately 1 kilogram per liter, therefore, a 208-liter container could weigh as much as 208 kilograms, when multiplied by 1,000, you arrive at a 1,000 container equivalent load of 208,000 kilograms, which these storage buildings are rated for. With regards to the 908 kilogram forklift, this discussion is for informational purposes only. The only intent behind the statement commented on is to demonstrate that the floor is capable of accommodating a given waste load in conjunction with waste handling equipment.

CLOSED (6/4/97) - THE TEXT OF SECTION 2.1.1 HAS BEEN MODIFIED AS FOLLOWS: "The floor accommodates a 908-kilogram forklift and an approximate 1,000 container equivalent load, ~~depending on waste management criterion~~ ~~not to exceed the floor loading limit of.~~ ~~The floor loading is limited to 0.22 kilogram per square centimeter.~~"

5. Page 2-2, line 22. Comment: What type and magnitude of module modification does it take to facilitate modification of the Part A. As the text reads now, there could be a lot of changes to the modules with little or no revision to the CWC Part A.

Requirement: Provide further information on the process.

DOE-RL/FDH Response: Correct. The CWC is constructed and continues to accommodate construction for the addition of storage locations as waste management needs dictate. The Part A description allows for the flexibility to modify existing storage locations without a revision. The process design capacity identified in Section III.B.1. of the Part A is large enough to accommodate any new storage locations without an increase, however, the Part A would be revised whenever new storage locations outside the TSD unit boundary are identified as being needed.

CLOSED (7/9/97).

6. Page 2-3, line 9. Comment: Please see comment/requirement #4 above.

DOE-RL/FDH Response: Refer to response to comment 4.

CLOSED (6/4/97) - SAME RESPONSE AS COMMENT 4.

7. Page 3-1, Section 3.1. Comment: Although the reference to the Dangerous Waste Application Requirements is correct, the section does not fulfill the prescribed elements laid out in C-1 and C-1(a). C-1(a) stipulates the following: "Include the identity and concentration of all constituents and physical properties"

Requirement: Clarify how the text presented in section 3.1 meets the elements of C-1 and C-1(a).

DOE-RL/FDH Response: This draft permit application was developed before the WAP guidance was finalized. The WAP will be revised before the next submittal to incorporate the guidance.

8. Page 3-1, line 14. Comment: This sentence identifies mixed waste as being the only type of waste that can be stored in CWC. Does this mean there is absolutely no "non-mixed" dangerous waste currently stored at CWC?

Requirement: Provide information to answer the above question.

DOE-RL/FDH Response: The CWC can accept any type of waste, however, for the purpose of this Part B, mixed waste and only the dangerous waste portion of that mixed waste (excluding radionuclides) is subject to Ecology regulation. The CWC also can store low-level waste and transuranic waste and this waste is not subject to Ecology regulation. The CWC mission supports these waste management activities. This draft permit application was developed before the WAP guidance was finalized. The WAP will be revised before the next submittal to incorporate the guidance.

9. Pages 4-1, line 48. Comment: This paragraph does not mention "state only" waste codes WSC2 and W001. Is this list meant to be comprehensive or not?

Requirement: Please explain why the two waste codes mentioned above are not listed under section 4.1.1.1.

DOE-RL/FDH Response: Accept, dangerous waste numbers WSC2 and W001 will be added.

CLOSED (8/13/97).

10. Page 4-1, line 46. Comment: The text indicates that marking and labeling requirements are discussed in chapter 3.0, Where?

Requirement: Please identify where these instructions are specifically found in chapter

DOE-RL/FDH Response: Accept. Text will be modified as follows and moved to a stand alone section (Section 4.1.1.3): "Mixed and/or radioactive waste containers are labeled and marked to indicate the dangerous and radioactive characteristics of the waste. The U.S. Department of Transportation (DOT) labels are used as the primary tool to meet major risk(s) labeling requirements in WAC 173-303-630(3). For Class 9 DOT hazardous materials, the "TOXIC" label will be used. For state-only wastes, the hazardous waste label shall be considered the major risk marking. The hazard labels are affixed, as required, to the sides of the containers, and each mixed waste container has a hazardous waste identification sticker attached in accordance with Ecology requirements. Marking and labeling requirements on the waste records are discussed in Chapter 3.0, Section 3.2. In addition to the U.S. Department of Transportation marking

~~and labeling requirements, all waste containers are marked as follows:~~

- ~~• 'PERSISTENT' If a WPO1, WPO2, or WPO3 waste number is applicable~~
- ~~• 'TOXIC' If a WTO1 or WTO2 waste number is applicable.~~

~~Containers currently in storage will remain as labeled, unless moved to another Hanford Facility TSD unit. State only waste numbers also are added to containers being moved to another TSD unit."~~

OPEN (8/13/97) PENDING APPROVAL BY ECOLOGY AND WMH. CLOSED (9/15/97).

11. Page 4-2, Section 4.1.1.2. Comment: Requirement D-1c, although referenced, is not met in this section. Container Labeling is not discussed anywhere in this section.

Requirement: Please clarify where labeling is described in this section, or where it can be found in the Part B. If it is not currently in the Part B, please add it, pursuant to requirement D-1c.

DOE-RL/FDH Response: Accept. ~~Text will be added.~~ Container labeling text was inadvertently placed into Section 4.1.1.1. Text located on Page 4-1, lines 42-52, and Page 4-2, lines 1-3, will be moved to a new section 4.1.1.3 in accordance with comment #10 to be consistent with the permit application requirements checklist. Reference to "D-1c" in line 5 of page 4-2 will be removed.

CLOSED BASED ON RESOLUTION OF COMMENT #10 (8/13/97). CLOSED (9/15/97).

12. Page 4-2, line 41. Comment: This section is incomplete. The secondary containment calculations (as noted in Appendix 4C) are not yet available. This requirement must be met during interim status, just as it would be required in final status.

Requirement: Provide these calculations as soon as possible. The Part B cannot be approved without these calculations completed and inserted into the document.

DOE-RL/FDH Response: The secondary containment calculations were included in Revision 0. These calculations are currently being converted to metric per a DOE-RL direction, field walkdowns are being performed to verify previous calculations completed from design drawings, and will be provided when completed.

OPEN PENDING COMPLETION OF INFORMAL RL TRANSMITTAL OF REVISED SECONDARY CONTAINMENT CALCULATIONS. RUN-OFF DISCUSSIONS RELATED TO SECTION 4.1.2.2 ARE PENDING (8/13/97).

13. Page 4-3, line 27. Comment: How can sections 4.1.2.2 and 4.1.2.3 be completely accurate if the

secondary containment calculations, as noted in comment #12, are not complete?

Requirement: Explain how discussions provided in sections 4.1.2.2 and 4.1.2.3 are valid without the appropriate calculations completed.

DOE-RL/FDH Response: Refer to response to comment 12. Once the secondary containment calculations are converted to metric provided to Ecology, the sections referencing these calculations will be verified.

OPEN PENDING RESOLUTION OF COMMENT #12 (8/13/97).

14. Page 4-4, line 10. Comment: How visually accessible are the trench drains? Can an accurate assessment of the volume contained by the trenches be made?

Requirement: Describe in more detail the visual accessibility of the storage pad trenches.

DOE-RL/FDH Response: The trenches are covered with a grate, the grate has holes, and this grate provides for ocular verification. ~~This verification allows for an estimate of the trench volume to be determined.~~ The dimensions of the trench are known, and the volume of accumulated liquid can be estimated to within 10 percent.

CLOSED (8/13/97).

15. Page 4-4, line 21. Comment: In what building is the logbook kept and what type of release would facilitate a change to the logbook.

Requirement: Please provide answers for the above questions.

DOE-RL/FDH Response: The logbook usually is kept at M0-288 during operating hours. All other times, the logbook is stored in M0-720 in a fire resistant file cabinet (on the waste receiving and staging area). Any release of accumulated water from the Mixed Waste Storage Pad trench is recorded in the logbook regardless of quantity.

OPEN PENDING REVIEW OF RAIN WATER DISCHARGE PERMITTING REQUIREMENTS (8/13/97). OPEN PENDING FURTHER REVIEW BY ECOLOGY AND WMH (10/01/97). OPEN PENDING ECOLOGY/WMH REVIEW OF INTERIM REQUIREMENTS IN THE LIQUID EFFLUENT CONSENT ORDER FOR STORM WATER DISCHARGES (10/15/97).

16. Page 4-5, line 26. Comment: Who is responsible for developing a sampling and analysis plan for the wipe sampling events?

Requirement: Revise document to include more detail on the development and implementation of the sampling plan.

DOE-RL/FDH Response: There is no sampling plan for the cleanup of spills. Procedures are in place to clean up spills and to verify the adequacy of the cleanup. Sampling plans are prepared for closure activities, but are not required by WAC 173-303 for spill cleanup.

~~OPEN - DEFER TO BUILDING EMERGENCY PLAN (9/15/97). PAGE 4-5, LINES 13-16 WILL BE DISCUSSED IN THE WAP. WMH WILL DETERMINE THE PURPOSE OF WIPE SAMPLING (E.G. RAD OR CHEMICAL) AND WILL MAKE A RECOMMENDATION TO EITHER RETAIN OR DELETE THE LANGUAGE FROM THE PERMIT APPLICATION. RL RESPONSE WILL BE MODIFIED ACCORDINGLY (10/15/97).~~

17. Page 4.-6, line 32. Comment: This sentence is somewhat confusing. The Part A describes solidification of free liquids as a treatment process performed at CWC, yet free liquids are only looked for under specific instructions. Does this mean there is a potential for free liquids to be stored at CWC? If so, how does the Part A reflect this. Of the drums that are stored long term, what percentage of the total drum volume can contain free liquid?

DOE-RL/FDH Response: The CWC meets all regulatory requirements (WAC 173-303) to store free liquids. The Part B will be written to reflect this operating flexibility (Section 4.1.1.). Current waste acceptance criteria limit liquids from 1 to 3 nineteen liter leak resistant containers overpacked in a container that contains twice the absorbent amount of material needed to absorb the liquid. See comment 17-A.

CLOSED (9/15/97).

17-A. BASED ON PAST EXPERIENCE WITH OFFSITE GENERATORS (I.E., ARGONNE NATIONAL LABORATORY), WHAT MODIFICATIONS TO SECTION 4.1.1. WILL OCCUR IN THE PART B PERMIT APPLICATION TO SPECIFY ACCEPTABLE PACKING MATERIAL (E.G., ABSORBANTS).

DOE-RL/FDH Response: Additional text will be drafted to address acceptance criteria for the absorbants used.

OPEN (9/15/97). OPEN PENDING REVIEW OF TEXT TO BE PROVIDED BY RANDY/LARRY. VERIFY THAT ATG CAN ACCEPT WASTE WITH THE TYPE OF ABSORBANTS WE ARE USING. (10/02/97).

18. Page 4-7, line 16. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(1). The following direction is given: "Provide sketches, drawings, or data that containers of reactive waste exhibiting a characteristic specified in WAC 173-303-090(7)(vi), (vii)

or (viii) are stored in a manner equivalent . . . ,” but is not indicated in the text currently in the permit application.

Requirement: Explain why all of the information identified in D-1f(1) is not provided in section 4.3.1. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will be considered as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations. ~~Figures in Chapter 1.0 provide details. RL/Contractors will provide sketches, drawings or data in the permit application to demonstrate how the reactive wastes described in WAC 173-303-630(8)(a) will be managed in a manner equivalent with the UFC table.~~

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF SITE PLANS/WAC REQUIREMENTS (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY (10/02/97).

19. Page 4-7, line 23. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(2). The following direction is given: “Provide sketches, drawings, or data demonstrating that container storage of ignitable waste and reactive waste.” Requirements listed in section D-1f(2) go beyond what the permit language currently includes.

Requirement: Explain why all of the information identified in D-1f(2) is not provided in section 4.3.2. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will be considered as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations. ~~Figures in Chapter 1.0 provide details. RL/Contractors will provide sketches, drawings or data in the permit application to demonstrate how the reactive wastes described in WAC 173-303-630(8)(b) will be managed in a manner equivalent with the UFC table.~~

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF SITE PLANS/WAC REQUIREMENTS (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY (10/02/97).

20. Page 4-7, line 32. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(2). The following direction is given: “Through sketches, drawings, and/or data demonstrate that a container holding a dangerous that is compatible with any waste” Requirements

listed in section D-1f(3) go beyond what the permit application language currently includes.

Requirement: Explain why all of the information identified in D-1f(3) is not provided in section 4.3.3. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will consider as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations. Figures in Chapter 1.0 provide details.

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF SITE PLANS/WAC REQUIREMENTS (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY (10/02/97).

21. Page 6-2, line 8. Comment: Section F-2 in the requirements is actually entitled, "Inspection Plan," not "Inspection Requirement." What process does CWC have that would be considered equivalent?

Requirement: Explain how WAC-173-303-806 (4)(a)(v), -303-320, -303-340, 40CFR 270.14, and 264.15 are being met within this section, or even within the permit application.

DOE-RL/FDH Response: This information is contained in Sections 6.2.1, 6.2.1.1, 6.2.1.2, 6.2.2, 6.2.3 and 6.2.3.1 and 6.2.3.2.

OPEN PENDING ECOLOGY REVIEW OF REFERENCED SECTIONS (9/15/97).

22. Page 6-2, line 24. Comment: There is no apparent attempt in this section to meet requirement F-2a(1).

Requirement: Please review the elements identified in F-2a(1) and describe how these are met with the permit application.

DOE-RL/FDH Response: The Ecology Part B checklist is guidance and not everything contained is required by the regulations.

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF WAC 173-303 AND ECOLOGY GUIDANCE DOCUMENT (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY (10/02/97).

23. Page 6-2, line 24. Comment: It would be helpful to get a copy of a blank inspection checklist, in order to better understand what is actually looked for on a standard inspection

Requirement: Please provide a copy.

DOE-RL/FDH Response: Checklist is available at the TSD unit and one will be provided. However, the checklist will not be included in the Part B as inclusion is not required by WAC 173-303.

OPEN PENDING ECOLOGY REVIEW OF INSPECTION CHECKLIST (9/15/97). CLOSED (10/02/97).

24. Page 6-3, Line 35. Comment: F-2c(1)(c) requires specifying actual timelines for taking corrective action. Line 35 of Section 6.2.2 of the permit application defers discussion of the timeline to the BEP (appendix 7a). The BEP does not indicate a timeline for corrective action.

Requirement: Revise either section 6.2.2 and/or the BEP pursuant to F-2c with regard to all spill types. Please emphasize timeline for corrective actions and positions responsible for taking corrective action or ensuring other staff remedy the problems. If this information is already available, please identify where it exists. Further discussion on adequacy of the information with regard to regulatory requirements will most likely be necessary.

DOE-RL/FDH Response: The Ecology Part B checklist is guidance and not everything contained is required by the regulations.

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF WAC 173-303 AND ECOLOGY GUIDANCE DOCUMENT (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY. THIS COMMENT WILL BE ADDRESSED AFTER A DECISION IS MADE REGARDING WHAT APPEARS IN CHAPTER 7.0 OF THE APPLICATION. (10/02/97).

25. Page 6-4, line 15. Comment: This section refers the reader to section 6.2.2, which refers the reader to the BEP for corrective actions other than spills to secondary containment. As discussed in comment #24, the BEP does not adequately address corrective action schedules.

Requirement: Please see requirement #24 with focus on F-2d(1)(b)(i) and (ii).

DOE-RL/FDH Response: Refer to response to comment 24.

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF WAC 173-303 AND ECOLOGY GUIDANCE DOCUMENT (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY. THIS COMMENT WILL BE ADDRESSED AFTER A DECISION IS MADE REGARDING WHAT APPEARS IN CHAPTER 7.0 OF THE APPLICATION. (10/02/97).

26. Page 7-1. Comment: Currently, Ecology is having internal discussions on whether the combination of unit specific BEP and Attachment 4 of the Hanford Facility Permit (DOE/RL 91-28) plus other documents, such as, the plant operating procedures and WHC-CM-4-43 actually make up an effective "overall contingency plan."

October 15, 1997

The main questions Ecology has at this time is: (1) When do USDOE and contractors actually consider the BEP implemented, and (2) what does that mean in terms of reporting requirements? Additional NODs will results from that discussion.

Requirement: Please prepare for future discussions on how the combination of all of the documents actually fulfill requirements pursuant to WAC 173-303-350.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during ~~current~~future discussion with Ecology.

OPEN - ECOLOGY WILL RESUBMIT NOD'S FROM 1996 REGARDING THE BEP FOR CWC (9/15/97). THIS COMMENT WILL BE ADDRESSED AFTER A DECISION IS MADE REGARDING WHAT APPEARS IN CHAPTER 7.0 OF THE APPLICATION (10/02/97).

27. Page 10-1. Comment: There is no mention of intent to meet 40 CFR 264.75(h) and (i) requirements. A quick review of DOE/RL-97-16, the Hanford Site Annual Dangerous Waste Report, indicates some deficiencies. Generator identification is lacking in most cases and there is no mapping of waste location as required in 40 CFR.

Requirement: Review the federal requirements. Revision of -97-16 or Section 10 of the permit application will be necessary.

DOE-RL/FDH Response: The requirements of 40 CFR 264.75(h) and (i) are not met through the Part B Permit Application requirements but through reporting mechanisms outside of the Hanford Facility RCRA permit. The waste minimization requirements are contained in the HSWA portion of the Hanford Facility RCRA Permit, Condition II.F and only address the certification requirement of 40 CFR 264.73(b)(9). There is no need to include information regarding 40 CFR 264.75(h) and (i) in the CWC portion of the Hanford Facility Part B Permit Application. This text has been agreed to by Ecology and is reflected in the *Hanford Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28), Chapter 10.

OPEN (6/4/97) - RFSH WILL PROVIDE ECOLOGY A COPY OF WASTE MINIMIZATION PLAN FOR SOLID WASTE AND A COPY OF THE ANNUAL REPORT THAT IS GIVEN TO THE WASTE MINIMIZATION GROUP. ~~TONY MISKHO WILL PROVIDE ADDITIONAL INFORMATION TO THE DOE-RL/FDH RESPONSE.~~ CLOSED PENDING ECOLOGY REVIEW OF ANNUAL CERTIFICATION IN CWC OPERATING RECORD (7/9/97). LARRY OLSEN WILL PROVIDE A COPY OF THE CWC WASTE MINIMIZATION CERTIFICATION IN THE OPERATING RECORD TO TED WOOLEY (8/13/97). OPEN PENDING TED REVIEW OF RECORDS (10/02/97).

28. Page 11-2 line 1. Comment: Reference to the background document will require updating. A cross-reference to the appropriate contractor will be necessary, unless some portions of Westinghouse Hanford still exist. If WHC 1991a is the relevant document then Ecology concurrence should have occurred and been documented, or use of it for permitting activities may not be appropriate. Also, sampling requirements

imposed by WAC-173-340, as implemented by WAC-173-303, must be considered in corrective action.

Requirement: Revise the permit application to correctly reference the site background document and verify Ecology approval of the document. Also, add the reference to WAC-173-340.

DOE-RL/FDH Response: Refer to the *General Information Portion* (DOE/RL-91-28), Chapter 11.0. The correct sampling methods are identified in SW-846. It is anticipated that the CWC will be clean closed and, therefore, corrective action will not be required. Reference to WHC 1991a will be removed.

CLOSED (6/4/97) - THE TEXT WAS REVISED AS FOLLOWS: "The CWC will be considered clean when the sampling of the structures and the surrounding soil shows that the concentrations for all constituents of interest are present at concentrations at or below the appropriate background or regulatory thresholds as discussed in the *General Information Portion* (DOE/RL-91-28, Chapter 11.0, Section 11.1.1.1).—Soil background levels will be based on established and accepted Hanford Site soil background information (WHC 1991a) or established by soil sampling per SW-846 (EPA-1986)."

29. Page 11-2 line 11. Comment: There is no mention of providing Ecology with a sampling and analysis/decontamination plan as part of the closure requirements. Although this may be implied, it makes sense to actually identify this as a major deliverable prior to implementing closure activities.

Requirement: Revise section 11.1.2 to include an Ecology approved the SAP/decon plan as a preclosure deliverable. The format will be based on the most current Ecology guidance (current to the year that CWC is actually closed).

DOE-RL/FDH Response: The CWC is not anticipated to be closed for a number of decades. When the CWC does close, the current regulatory requirements for development of a closure plan will be followed/submitted.

CLOSED (6/4/97) - THE TEXT WAS MODIFIED AS FOLLOWS: " Any sampling and analysis activities required for clean closure will be accomplished in accordance with a sampling and analysis/decontamination plan that meets the requirements in place at the time of closure. Closure will entail random sampling of the soil surrounding the storage and loading areas to verify that no contaminants above background or regulatory thresholds are present at the time of closure. Additionally, authoritative samples will be taken as necessary based on information available at the time of closure."

30. Page 13-1. Comment: WAC-173-340 will require referencing. Also, as stated in the requirements list,^c all permits applied for or received from any regulatory agencies.

Requirement: Please revise the permit application to meet this requirement under Section J.

DOE-RL/FDH Response: In accordance with the *Hanford Facility Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28) Revision 3, Page 13-1 line 30-31, Section 13.0 of the CWC portion will be revised to include the list of applicable laws and requirements. Descriptions of the applicable laws and requirements are found in the *Hanford Facility Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28), Section 13.0 and will not be duplicated. ~~This text has been agreed to by Ecology and is reflected in the General Information Portion (DOE/RL-91-28), Chapter 13.0.~~

OPEN (6/4/97 AND 7/9/97) - PENDING REVIEW OF LIST PLACED INTO SECTION 13.0. TED WILL REVIEW THE REVISED CHAPTER 13.0 AND DISCUSS WITHIN ECOLOGY (8/13/97).

31. Page APP 3A-i. Comment: A detailed set of NODs on the Waste Analysis Plan (WAP) for CWC will be submitted by Ecology in the coming weeks. There are still some outstanding issues on the WAP guidance that need resolution.

Requirement: An agreement of when Ecology will provide NODs on the WAP will be discussed as part of the work shop schedule at the next project managers meeting.

DOE-RL/FDH Response: A CWC WAP addressing the guidance developed during the workshops with DOE-RL, FDH/RFSH, and Ecology will be developed.

32. Page APP 4C-i. Comment: When will secondary containment calculations be available? The part B cannot be approved prior to having the calculations.

Requirement: Please give a date.

DOE-RL/FDH Response: Refer to response to comment 12. Secondary containment calculations will be provided by July 31, 1997.

33. Page APP 4D-i. Comment: There is no information on how durable the sealant is in terms of reaction to chemical spills and physical damage from drum movement. MSDS information, although necessary, does not whether the sealant is appropriate for the application it is being used for.

Requirement: Revise the permit application, adding the requested information.

DOE-RL/FDH Response: Although the regulations do not require the installation of a protective coating over the concrete floors, this added protection for the concrete exceeds what is required by the regulations. The MSDS's provide general physical and chemical descriptions of the coatings.

OPEN - LARRY/KENT WILL PROVIDE THE SPECIFICATIONS FOR THE SEALANT (10/02/97).

34. Page APP 7A-i. Comment: Ecology is not prepared to give a complete set of NODs on the BEP because of current internal discussions.

Requirement: A date will be set for submittal of BEP NODs. NODs were submitted in January 1996 which, at a minimum, will require completed resolution. Additional NODs will be dependent on the outcome of Ecology discussions.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussions with Ecology.

THIS COMMENT WILL BE ADDRESSED AFTER A DECISION IS MADE REGARDING WHAT APPEARS IN CHAPTER 7.0 OF THE APPLICATION (10/02/97).

35. Page APP 8A-i. Comment: There is no reference to Section H the Dangerous Waste Application Requirements document, Why?

Requirement: To be consistent and to have the correct focus on training requirements, please reference Section H.

DOE-RL/FDH Response: Section H is complied with by directing the reader in Chapter 8 to Appendix 8A. Appendix 8A contains the Solid Waste Disposal training plan. This training plan is included in the 616 Nonradioactive Dangerous Waste Storage Facility (616 NRDSWF) Permit, which has been accepted by Ecology, and included in the HF RCRA Permit, Part III, Chapter 1.

36. Page 12, 1st para. under bullets. Comment: What happens with personnel who cannot pass the training requirements. Are they restricted from doing related work?

Requirement: Please clarify how training deficiencies are handled.

DOE-RL/FDH Response: Personnel are retested and/or provided with additional instruction. If the personnel cannot pass the required tests necessary to perform his/her job, this individual is (1) not allowed to perform this particular job or (2) is allowed to perform the job, but under close supervision (this depends on the hazards associated with the job).

37. Page 13, 1st sentence. Comment: Define exempt personnel.

Requirement: For clarification purposes, please define which positions are considered exempt.

DOE-RL/FDH Response: Refer to the Fair Labor Standard Act of 1964. This term does not infer that an

employee does not have to meet specific requirements, but refers to how the human resources organization manages payroll.

38. Page 15, Section 5.11. Comment: How long is a person allowed to remain in the remedial training program, and what work restrictions are imposed on them during this time?

Requirement: Please answer questions.

DOE-RL/FDH Response: Remedial training program is determined by the individual's immediate manager/supervisor. Remedial training programs generally do not exceed 6 months; however, this is up to the immediate manager/supervisor.

39. Page A-1, 1st para. Comment: What process is in place for determining what type of training applies to a specific position?

Requirement: Clarify how this determination is made.

DOE-RL/FDH Response: This is an ongoing process. Any changes in operations are evaluated and a determination is made if additional, reduced, or no change is required. Personnel are then trained accordingly based on this ongoing evaluation.

40. Page A-2, Training Matrix. Comment: This table is confusing.

Requirement: Part of a project managers meeting will be devoted to discussion on how to use the table.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussions with Ecology.

41. Page A-12, Category G. Comment: The 40 hour and 16 hour Hazardous Waste Operations Training is considered "Non-RCRA," why?

Requirement: Clarify how this is categorized as "Non-RCRA."

DOE-RL/FDH Response: This training is required by OSHA and 29 CFR 1910.120 and not the dangerous waste regulations. This is Health and Safety training and not waste management training.

Distribution:

W. D. Adair	FDH	(H6-21)*
M. D. Aichele	WMH	(T4-03)*
R. R. Ames	WMH	(T4-03)
L. D. Arnold	FDH	(G3-27)*
E. S. Aromi	WMH	(T3-01)*
R. C. Bowman	WMH	(H6-24)*
R. M. Carosino	RL	(A4-52)
C. E. Clark	RL	(A5-15)*
R. H. Engelmann	WMH	(H6-26)*
E. G. Erpenbeck	FDNW	(G3-15)*
R. J. Giroir	WMH	(T4-05)*
J. W. Golden	FDH	(N1-26)*
R. F. Guercia	RL	(S7-55)*
R. M. Irwin	WMH	(T4-03)*
P. J. Macbeth	GSSC	(R3-82)*
K. M. McDonald	WMH	(T4-04)*
A. C. McKarns	RL	(A5-15)
A. G. Miskho	FDH	(H6-23)*
L. R. Olsen	WMH	(T4-61)
S. M. Price	FDH	(H6-23)*
F. A. Ruck III	FDH	(H6-23)*
D. G. Saueressig	WMH	(H6-24)
H. T. Tilden II	PNL	(P7-79)
B. D. Williamson	FDH	(B3-15)*
J. A. Winterhalder	WMH	(H6-21)*
T. A. Wooley	Ecology	(B5-18)
M. T. Yasdick	WMH	(H6-10)*
RCRA Files	WMH	(H6-23)

*cc:Mail

ADMINISTRATIVE RECORD: Central Waste Complex, TS-2-4 [Care of EDMC,
FDH (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files,
P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101,
Mail Stop HW-070 (Records Center)

Please send comments on distribution list to D. Saueressig, WMH
(H6-24), (509) 376-9739